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9 NORTH AMERICA

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21 Attorneys for Plaintiff  
22 GWENDOLYN R. SAMPSON-BROWN

23 UNITED STATES DISTRICT COURT  
24 NORTHERN DISTRICT OF CALIFORNIA

25 GWENDOLYN R. SAMPSON-BROWN,

26 Plaintiff,

27 v.

28 FRESENIUS MANAGEMENT SERVICES,  
INC. and DOES 1 through 20, inclusive.

Defendants.

Case No. 4:20-cv-01331-HSG

**STIPULATION AND ORDER RE:  
FEDERAL RULE OF EVIDENCE  
502(D)**

State Complaint Filed: 10/11/19  
Trial Date: Not Set

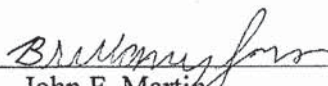
1 The Parties hereby enter into the following stipulation regarding the production of  
2 privileged or work-product protected documents as follows:

3 Plaintiffs and Defendant stipulate, through their counsel of record, that the unintentional or  
4 intentional production of privileged or work-product protected documents, whether inadvertent or  
5 otherwise, is not a waiver of the privilege or protection from discovery in this case or in any other  
6 federal or state proceeding. This Order shall be interpreted to provide the maximum protection  
7 allowed by Federal Rule of Evidence 502(d).

8 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.


9  
10 MARTIN & VANEGAS, APC

11  
12 DATED: March 21, 2020

13 By:   
14 John F. Martin  
15 Marta R. Vanegas  
16 Brittany C. Jones  
17 Attorneys for Plaintiff  
18 Gwendolyn R. Sampson-Brown

19 JACKSON LEWIS P.C.

20  
21 DATED: March 24, 2020


22 By:   
23 Lisa Barnett Sween  
24 Spencer Davidson  
25 Attorneys for Defendant  
26 Fresenius Management Services, Inc d/b/a  
27 Fresenius Medical Care North America

28 I hereby attest that I have on file all holographic  
signatures corresponding to any signatures indicated  
by a conformed signature (/S/) within this e-filed  
document

PURSUANT TO STIPULATION, IT IS SO ORDERED.

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DATED: 3/25/2020

  
Honorable Haywood S. Gilliam, Jr.  
United States District Court Judge